CARB Cargo Tank Public Workshop Summary of Discussion March 2, 2005

1. Action Items

CARB

- Consider re-testing the hoses by actually "walking" them (similar to real operation.)
- Reassess emissions from hoses (e.g. eliminate amount of fuel delivered by bobtail trucks.)
- Enforcement Division will provide staff for 5-point testing field work...
- Notify loading racks when and where the 5-point tests will be conducted.
- Establish contact with DOT and research DOT 406 standards to determine what will require DOT approval.
- Research the differences with airport refuelers and the possible involvement of FAA.
- Research how other states control vapor lines.
- Conduct survey of hose cap use.
- Involve CIOMA members in the development of new test methods.
- Invite Kinder Morgan (terminal operations) to next workshop.
- Continue review of NOV files to determine average time between certification test date and issuance of NOV.

<u>Industry</u>

- Benito and Mike Williams offered the use of their trucks to begin the 5-point pressure survey.
- CIOMA will solicit additional volunteers for 5-point pressure survey and the valve durability study.
- All participants were asked to comment on the draft degassing survey by March 16, 2005.
- A ratio for number of product hoses to volume of fuel delivered was suggested.

2. Additional Comments and Questions Raised

Delivery Hoses

• Industry commented that 4,000 gallons per load is too small. It should be closer to 8,000 to 9,000 gallons per load. CARB responded that the calculations were based on number of hoses per delivery; this works out to 4,000 gallons per hose use, but CARB can consider using a number that industry provides.

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Internal Vapor Valve

- Industry commented that a manually operated valve at the end of the vapor line would be subject to error, possibly resulting in collapse of tank during deliveries.
- Other states may require alternate technologies that CARB should investigate.

P/V Vent Valve

- Industry commented that CARB should be focused on the equipment not the equipment operators.
- Industry commented that even changing the cracking pressure would not prevent debris from getting into the valve seats and causing leaks.
- Can the p/v vent valve be mounted elsewhere (e.g. in the vapor rail)?

General

- Industry commented that inspection and maintenance activities destroy gaskets so it's no surprise that gaskets get replaced frequently.
- Coordinate terminology between CARB and industry.
- Next workshop to be scheduled for early summer, 2005.